

The Honorable Stanley A. Bastian

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

DEMETRIOS VORGIAS,

Plaintiff,

v.

COMMUNITY HEALTH OF CENTRAL
WASHINGTON,

Defendant.

Case No.: 1:21-cv-03013-SAB

**DECLARATION OF COUNSEL
WILLIAM D. PICKETT IN
SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT**

1 I, William D. Pickett, under penalty of perjury, under the laws of the United
2 States of America and the laws of the State of Washington, hereby state the
3 following is true and correct:
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5 1. I am over the age of 18 years and am a citizen of the United States. I
6 one of the attorneys of record for Plaintiff Demetrios Vorgias. This declaration is
7 based on personal knowledge, and am competent to testify to the matters in this
8 declaration.
9

10 2. Attached as **EXHIBIT A: 000001-000007**, and highlighted for ease of
11 reference, are true and correct copies of excerpts from the October 18, 2021,
12 deposition of CHCW-CWFM current residency program director, Brandon Issacs,
13 M.D.
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15 3. Attached as **EXHIBIT B: 000008-000040**, and highlighted for ease of
16 reference, are true and correct copies of excerpts from the November 4, 2021,
17 deposition of CHCW-CWFM former “interim” residency program director (January
18 through May of 2019), Michahlyn Powers, M.D.
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20 4. Attached as **EXHIBIT C: 000041-000060**, and highlighted for ease of
21 reference, are true and correct copies of excerpts from the November 10, 2021,
22 deposition of former employee of CHCW-CWFM Katina Rue, D.O.
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1 I declare under penalty of perjury, under the laws of the United States of
2 America and the laws of the State of Washington, that the foregoing is true and
3 correct:
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5 **DATED** this 29th day of November, 2021, at Yakima, Washington.
6

7
8 s/William D. Pickett,
9 WILLIAM D. PICKETT, WSBA No. 27867
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CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED at Yakima, Washington, this 29th day of November, 2021.

By: s/ William D. Pickett
William D. Pickett, WSBA NO. 27867